

LAWRENCE G. TOWNSEND (SBN 88184)  
LAW OFFICES OF LAWRENCE G. TOWNSEND  
455 Market Street, Suite 1910 Floor  
San Francisco, California 94105  
Telephone: (415) 882-3288  
Facsimile: (415) 882-3299  
E-Mail: ltownsend@owe.com

Attorneys for Plaintiff JIM MARSHALL PHOTOGRAPHY LLC

S. CHRISTOPHER WINTER (SBN 190474)  
DYKEMA GOSSETT LLP  
333 South Grand Avenue, Suite 2100  
Los Angeles, CA 99971  
Telephone: (213) 457-1800  
Facsimile: (213) 457-1850  
E-Mail: [swinter@dykema.com](mailto:swinter@dykema.com)

Attorneys for Defendants JOHN VARVATOS ENTERPRISES, INC.;  
JOHN VARVATOS and BLOOMINGDALE'S, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JIM MARSHALL PHOTOGRAPHY LLC,

Plaintiff,

vs.

JOHN VARVATOS, INC., a Delaware  
corporation; JOHN VARVATOS, an  
individual; and BLOOMINGDALE'S, INC., a  
Delaware corporation,

Defendants.

Case No. CV11-6702-DMR

**STIPULATION TO CONTINUE  
FURTHER CASE MANAGEMENT  
CONFERENCE; [~~PROPOSED~~] ORDER**

**Date:** August 22, 2012

**Time:** 1:30 p.m.

**Courtroom:** Courtroom 4, 3<sup>rd</sup> Floor  
The Hon. Donna M. Ryu

The parties, by and through their counsel, hereby stipulate that the Case Management Conference, presently set for August 22, 2012 be continued for one week to August 29 at 1:30 P.M., or at another date convenient for the court. The basis of the request is set forth in the accompanying declaration of Lawrence G. Townsend, as required by L.R. 6-2, and is as follows:

1           1.       The parties completed the mediation through the court-appointed mediator on  
2 July 18, have prior to and since then been diligently exchanging paper discovery, and since the  
3 mediation have been working diligently to schedule depositions.

4           2.       Three depositions needed to be scheduled in New York the week of August 20,  
5 the only week that would work, to accommodate all the various schedules, but the Case  
6 Management Conference is presently scheduled for Wednesday, August 22, 2012 at 1:30 P.M.

7  
8           Accordingly, the parties respectfully request that the current Case Management  
9 Conference be rescheduled for August 29, 2012 at 1:30 P.M. and that the due date of an updated  
10 Joint Case Management Conference Statement be due on August 22, 2012.

11  
12 Dated: August 14, 2012

LAW OFFICES OF LAWRENCE G. TOWNSEND

13  
14 By: /s/ Lawrence G. Townsend

15           Lawrence G. Townsend  
16 Attorneys For Plaintiff JIM MARSHALL  
17 PHOTOGRAPHY LLC

18  
19 Dated: August 14, 2012

DYKEMA GOSSETT LLP

20 By: /s/ S. Christopher Winter

21           S. Christopher Winter  
22 Attorneys For Defendants JOHN VARVATOS  
23 ENTERPRISES, INC.; JOHN VARVATOS and  
24 BLOOMINGDALE'S, INC.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION OF THE PARTIES, IT IS SO ORDERED.

Dated: August 15, 2012

By: \_\_\_\_\_

